

3

WALTER WILHELM LAW GROUP
A Professional Corporation
Riley C. Walter #91839
Kathleen D. DeVaney #156444
Danielle J. Bethel #315945
205 East River Park Circle, Ste. 410
Fresno, CA 93720
Telephone: (559) 435-9800
Facsimile: (559) 435-9868
E-mail: rileywalter@w2lg.com

Chapter 9 Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Debtor.

HEALTHCARE CONGLOMERATE
ASSOCIATES, LLC,

Plaintiff,

v.

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER; DOES 1 through
20,

Defendants.

CASE NO. 17-13797

Chapter 9

Adv. No.: 17-01095

DC NO.: OHS-1

**STIPULATION TO CONTINUE HEARING
AND ORDER THEREON**

Date: August 15, 2018
Time: 1:30 p.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

IT IS HEREBY STIPULATED AND AGREED by and between Healthcare
Conglomerate Associates, LLC and Tulare Local Healthcare District, by counsel, as
follows.

RECEIVED

August 03, 2018

CLERK, U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
0006332165

Hearing and Order Thereon

1 1. On December 28, 2017 Tulare Local Healthcare District removed to this
2 court an action ("Removed Action") that had been filed in the Superior Court for the
3 County of Los Angeles.

4 2. On January 24, 2018 Healthcare Conglomerate Associates, LLC filed a
5 Motion for Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b), D.C. No.
6 OHS-1, which is presently set for hearing on August 15, 2018 at 1:30 p.m.

7 3. On January 29, 2018 Healthcare Conglomerate Associates, LLC filed a
8 Motion to Dismiss Counterclaim Against HCCA or in the Alternative Strike Portions
9 Thereof, D.C. No. OHS-2, and Motion to Strike Portions of Answer of Tulare Local
10 Healthcare District dba Tulare Regional Medical Center, D.C. No. OHS-3, which are
11 now each set for hearing on August 15, 2018 at 1:30 p.m.

12 4. The parties have discussed these matters and agree that the hearings on
13 OHS-1, OHS-2 and OHS-3 will be continued to September 26, 2018 at 1:30 p.m. in
14 Fresno.

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///


28 ///

1 5. The parties stipulate and agree to entry of a court order approving this
2 stipulation.


3
4 IT IS SO STIPULATED.

5 KLEIN, DeNATALE, GOLDNER, ROSENLIB
6 & KIMBALL LLP; and

7 ORRICK, HERRINGTON & SUTCLIFFE LLP

8 By: 
9 Hagop T. Bedoyan,
10 Marc A. Levinson, Attorneys for
11 Healthcare Conglomerate Associates, LLC


12 WALTER WILHELM LAW GROUP

13 By: 
14 Riley C. Walter, Attorneys for
15 Tulare Local Healthcare District

16
17
18
19
20
21
22
23 ORDER

24 Per the Stipulation of the Parties, it is so ordered.
25 Dated: Aug 03, 2018

By the Court

26
27 
28 René Lastreto II, Judge
United States Bankruptcy Court